

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$1,418,519 in U.S. Currency, \$2,000 in  
U.S. Currency, \$792 in U.S. Currency,  
and \$1,891 in U.S. Currency,

Defendant

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CIVIL NO. 24-cv-369

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**VERIFIED COMPLAINT FOR FORFEITURE *IN REM***

Plaintiff, the United States of America, by its attorneys, Erek L. Barron, United States Attorney for the District of Maryland, and Stephanie Williamson and John J. Truex Chung, Assistant United States Attorneys, bring this verified complaint for forfeiture in a civil action *in rem* and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

**Nature of the Action**

1. This is a civil forfeiture action *in rem* against funds that constitute or are derived from proceeds traceable to a violation of 18 U.S.C. § 2421, and therefore should be forfeited to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 18 U.S.C. § 2428(b)(1)(B).

**The Defendant *In Rem***

2. The defendant property consists of \$1,418,519 in U.S. currency (Asset ID 19-CBP-000781), seized from Chuanfang Liu in Owings, Maryland on or about June 27, 2019; \$2,000 in U.S. currency (Asset ID 19-CBP-000782), seized from Lucy's Health & Acupressure, LLC at 421 Thompson Creek Road, Stevensville, Maryland on or about June 27, 2019; \$792 in U.S. currency (Asset ID 19-CBP-000783), seized from Lucy's Health & Acupressure, LLC at 69

Mayo Road, Edgewater, Maryland on or about June 27, 2019; and \$1,891 in U.S. currency (Asset ID 19-CBP-000784), seized from Chuanfang Liu at 69 Mayo Road, Edgewater, Maryland on or about June 27, 2019 (the “Defendant Property”).

3. On June 27, 2019, investigators from the Anne Arundel County Police Department executed state search and seizure warrants at Lucy’s Health & Acupressure, LLC located at 69 Mayo Road, Edgewater, Maryland, Lucy’s Health & Acupressure, LLC at 421 Thompson Creek Road, Stevensville, Maryland, and at the residence of Chuanfang Liu and Thomas Kelley in Owings, Maryland.

4. The United States brings this action *in rem* in its own right to forfeit all right, title and interest in the Defendant Property.

5. This forfeiture is based on, but not limited to, the evidence outlined in the attached Declaration of Homeland Security Investigations Task Force Officer Bernard Adkins, which is incorporated herein by reference.

#### Jurisdiction and Venue

6. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, over an action for forfeiture under 28 U.S.C. § 1355(a), and over this particular action under 18 U.S.C. § 981(a)(1)(C) and 18 U.S.C. § 2428(b)(1)(B).

7. This Court has *in rem* jurisdiction over the Defendant Property under 28 U.S.C. § 1355(b). Upon the filing of this complaint, the plaintiff requests the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the Defendant Property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

8. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b) because the acts or omissions giving rise to the forfeiture of the Defendant Property occurred in this district.

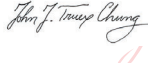
Legal Basis for Forfeiture

9. The Defendant Property is subject to civil forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 18 U.S.C. § 2428(b)(1)(B) because it constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 2421.

**WHEREFORE**, Plaintiff, the United States of America, prays that all persons who reasonably appear to be potential claimants with interests in the Defendant Property be cited to appear herein and answer the Complaint; that the Defendant Property be forfeited and condemned to the United States of America; that upon Final Decree of Forfeiture, the United States dispose of the Defendant Property according to law; and that the plaintiff receive such other and further relief as this Court deems proper and just.

Respectfully submitted,

Erek L. Barron  
United States Attorney

 Digitally signed by  
JOHN TRUEX CHUNG  
Date: 2024.02.06  
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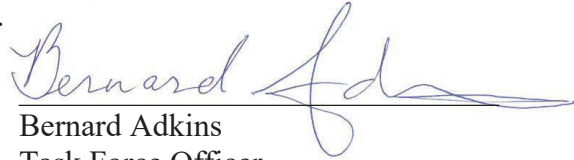
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Stephanie Williamson  
John J. Truex Chung  
Assistant United States Attorneys

**VERIFICATION**

I, Bernard Adkins, a Task Force Officer with the Homeland Security Investigations, declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the foregoing Verified Complaint for Forfeiture *In Rem* is based on reports and information known to me and/or furnished to me by other law enforcement agents and that everything contained therein is true and correct to the best of my knowledge and belief.

Date: 02/06/2024

A handwritten signature in blue ink, appearing to read "Bernard Adkins", written over a horizontal line.

Bernard Adkins  
Task Force Officer  
Homeland Security Investigations